

Peter G. Bertling (SBN 131602)
Jemma Parker Saunders (SBN 227962)
Bertling Law Group
21 East Canon Perdido Street, Suite 204B
Santa Barbara, CA 93101
Telephone: 805-879-7558
Facsimile: 805-962-0722
peter@bertlinglawgroup.com
jemma@bertlinglawgroup.com
Attorneys for Defendants
WELLPATH MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;
ALAMEDA COUNTY FEMALE
PRISONERS And Former Prisoners, JACLYN
MOHRBACHER, ERIN ELLIS, DOMINIQUE
JACKSON, CHRISTINA ZEPEDA, ALEXIS
WAH, AND KELSEY ERWIN, et al on behalf
of themselves and other similarly situated,

Plaintiffs,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy Joe,
Deputy Ignont (sp) Jane ROEs, Nos. 1 – 25;
WELLPATH MANAGEMENT, INC., a
Delaware Corporation (formerly known as
California Forensic Medical Group) a
corporation; its Employees and Sub-
Contractors, and Rick & Ruth ROEs Nos. 26-
50; **ARAMARK CORRECTIONAL**
SERVICES, LLC, a Delaware Limited
Liability Company; its Employees and Sub-
Contractors, and Rick & Ruth ROES Nos.
51-75,

Defendants.

Case No.: 3:19-cv-07423 JSC

**DEFENDANT WELLPATH
MANAGEMENT, INC.'S
REQUEST FOR
CLARIFICATION OF THIS
COURT'S SEPTEMBER 29,
2023, DISCOVERY ORDER AT
ECF NO. 328**

Action Filed: November 12, 2019
Judge: Hon. Jacqueline Scott Corley
Ctrm: E—15th Floor

3:19-cv-07423 JSC

**DEFENDANT WELLPATH MANAGEMENT, INC.'S REQUEST FOR CLARIFICATION
OF THIS COURT'S SEPTEMBER 29, 2023, DISCOVERY ORDER AT ECF NO. 328**

1 Defendant Wellpath Management, Inc. (“Wellpath”) appreciates the Court’s
2 September 29, 2023, Order regarding the parties’ current discovery dispute. However,
3 Wellpath seeks clarification of September 29, 2023, Order as to the following issue: Will
4 the Court please clarify which medical providers need to be identified? Many of the
5 Plaintiffs received treatment for medical conditions that are not identified in the Fifth
6 Amended Complaint or their discovery responses. This is why Wellpath objected to the
7 interrogatories as being overbroad. Will the Court please clarify that to comply with ECF
8 No. 328, Wellpath is only required to identify the providers who treated Plaintiffs for the
9 medical conditions alleged in the Fifth Amended Complaint and/or medical conditions
10 identified in Plaintiffs’ responses to written discovery and not any and all medical
11 treatment they received during each of their incarcerations?

12 Respectfully submitted,

13 DATED: September 29, 2023

BERTLING LAW GROUP

14 /s/ Peter G. Bertling

15 Peter G. Bertling

16 Jemma Parker Saunders

17 Attorneys for Defendant

18 WELLPATH
19
20
21
22
23
24
25
26
27
28